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September 20, 2000

The Honorable Catherine C. Blake
Garmatz Federal Courthouse
101 W. Lombard Street
1st Floor, Room 110
Baltimore, Maryland 21201

RECEIVED IN THE OFFICE OF
CATHERINE C. BLAKE

SEP 21 2000

RE: Case: *Sossen v. Solberg*
Case No.: CCB-00-1790 1796
Our File: 39096-BOATS

UNITED STATES DISTRICT JUDGE

Dear Judge Blake:

I represent the Defendant in the above-captioned personal injury case. Under the current Scheduling Order, the deadline for Defendant's Rule 26(a)(2) disclosures is October 16, 2000 and the discovery deadline is November 29, 2000. It has become apparent that the parties require additional time to complete discovery, despite the diligent efforts of counsel to do so within the deadline.

The Plaintiff has an extensive and extremely complex medical history involving numerous health care providers and voluminous medical records. While we have obtained many of the records, Plaintiff has recently identified additional health care providers in her Rule 26(a)(2) disclosures. There is no doubt that additional health care providers will be identified in Plaintiff's Answers to Interrogatories. Plaintiff's prior medical history is at the heart of the defense in this case. The opinions of Defendant's expert witnesses necessarily depends upon a complete review of her medical file and a meaningful examination, neither of which can be done until all of the records are obtained.

The trial of this case is scheduled to begin on May 21, 2001. A short extension of the discovery deadline will not cause any delay in the proceedings.

For these reasons, Defendant respectfully requests that the expert disclosure deadlines, discovery deadline and dispositive pretrial motions deadline be extended an additional sixty (60)

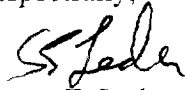
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days. Plaintiff's counsel has agreed to a sixty (60) day extension of these deadlines.

Thank you for your consideration in this matter.

Respectfully,


Steven E. Leder

cc: Paul Bekman, Esq.
Ralph Solberg
Lyn Kagey

"Approved" THIS 21st
DAY OF September, 2000


UNITED STATES DISTRICT JUDGE

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